

**OCA: Loan/Lender Monitoring System (L/LMS)**

**Exhibit 300: Part I: Summary Information and Justification (All Capital Assets)**

**I.A. Overview**

<b>1. Date of Submission:</b>	12/29/2006
<b>2. Agency:</b>	Small Business Administration
<b>3. Bureau:</b>	Lender Oversight
<b>4. Name of this Capital Asset:</b>	OCA: Loan/Lender Monitoring System (L/LMS)
<b>5. Unique Project (Investment) Identifier: (For IT investment only, see section 53. For all other, use agency ID system.)</b>	028-00-01-02-01-2001-00
<b>6. What kind of investment will this be in FY2008? (Please NOTE: Investments moving to O&amp;M ONLY in FY2008, with Planning/Acquisition activities prior to FY2008 should not select O&amp;M. These investments should indicate their current status.)</b>	Operations and Maintenance
<b>7. What was the first budget year this investment was submitted to OMB?</b>	FY2002
<b>8. Provide a brief summary and justification for this investment, including a brief description of how this closes in part or in whole an identified agency performance gap:</b>  <p>The Loan/Lender Monitoring System (L/LMS) is a management consulting contract. Its scope is financial risk assessment and management. It is not a physical or intellectual asset. The contractor provides similar, industry standard, "state of the art" risk assessment and management for the worldwide financial services industry. The analytics used in preparing risk assessments for the SBA are proprietary to the vendor. The investment does not create or transfer ownership of analytic methodology to the SBA. SBA receives the contractor's advice through oral presentations, written reports, and electronically including Internet access. The risk analysis provided is a key component of SBA's lender oversight function. About 75% of the \$11 billion of 7(a) loans generated annually are made by lenders to whom SBA has delegated the authority to make credit decisions. This situation creates a need to have meaningful, relevant information to measure, monitor and evaluate the risk in SBA's loan portfolios. L/LMS improves SBA's financial performance by providing better quality and more timely information from which to analyze program performance and make necessary changes. Risk management techniques are being employed to identify high risk areas in terms of both SBA lenders and loan programs. By automating the process, the previous labor intensive, one size fits all, manual process for reviewing lenders and identifying those with higher risk profiles, is replaced with a system that quantifies the risks associated with a given lender or loan program. With regard to expanding electronic government, L/LMS is an electronic system for gathering and analyzing information. It combines data already available from SBA with business information from D&amp;B and credit scoring results. This data is aggregated electronically for better quality analysis with more timely information. Less time is spent chasing data and more time spent analyzing data for better decisions. The L/LMS "lender portal", implemented in FY 2005, allows lenders electronic access to the analytical report of their own SBA portfolio and provides insight into the risk rating process. This risk based approach focuses limited human capital on those lending partners who pose the greatest risk. It reduces the burden on both small and large SBA lenders and eliminates the need to perform manual analysis on the smallest lenders.</p>	
<b>9. Did the Agency's Executive/Investment Committee approve this request?</b>	Yes

a. If "yes," what was the date of this approval?

10. Did the Project Manager review this Exhibit?	Yes
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11. Contact information of Project Manager?

Name

Phone Number

Email

12. Has the agency developed and/or promoted cost effective, energy efficient and environmentally sustainable techniques or practices for this project.	No
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a. Will this investment include electronic assets (including computers)?	Yes
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b. Is this investment for new construction or major retrofit of a Federal building or facility? (answer applicable to non-IT assets only)	No
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1. If "yes," is an ESPC or UESC being used to help fund this investment?	
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2. If "yes," will this investment meet sustainable design principles?	
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3. If "yes," is it designed to be 30% more energy efficient than relevant code?	
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13. Does this investment support one of the PMA initiatives?	Yes
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If "yes," check all that apply:

Budget Performance Integration, Expanded E-Government, Financial Performance

13a. Briefly describe how this asset directly supports the identified initiative(s)?

Improves financial performance by providing better quality and timely information. Risk management techniques are being employed to identify high risk areas. Expands electronic government by combining electronic data from SBA, D&B, and credit scoring. The Lender Portal allows lenders electronic access to the analytical report of their SBA portfolio. Budget and performance integration benefit from more close monitoring of loan program performance and cost effectiveness.

14. Does this investment support a program assessed using the Program Assessment Rating Tool (PART)? (For more information about the PART, visit <a href="http://www.whitehouse.gov/omb/part">www.whitehouse.gov/omb/part</a> .)	No
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a. If "yes," does this investment address a weakness found	No
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during the PART review?

b. If "yes," what is the name of the PART program assessed by OMB's Program Assessment Rating Tool?

c. If "yes," what PART rating did it receive?

15. Is this investment for information technology?

Yes

If the answer to Question: "Is this investment for information technology?" was "Yes," complete this sub-section. If the answer is "No," do not answer this sub-section.

For information technology investments only:

16. What is the level of the IT Project? (per CIO Council PM Guidance)

Level 1

17. What project management qualifications does the Project Manager have? (per CIO Council PM Guidance):

(1) Project manager has been validated as qualified for this investment

18. Is this investment identified as "high risk" on the Q4 - FY 2006 agency high risk report (per OMB's "high risk" memo)?

No

19. Is this a financial management system?

No

a. If "yes," does this investment address a FFMI A compliance area?

No

1. If "yes," which compliance area:

2. If "no," what does it address?

b. If "yes," please identify the system name(s) and system acronym(s) as reported in the most recent financial systems inventory update required by Circular A-11 section 52

20. What is the percentage breakout for the total FY2008 funding request for the following? (This should total 100%)

Hardware

0

Software

0

Services

0

Other

0

21. If this project produces information dissemination products for the public, are these products published to the Internet in conformance with OMB Memorandum 05-04 and included in your agency inventory, schedules and priorities?

No

22. Contact information of individual responsible for privacy related questions:

Name

Phone Number

Title

E-mail

23. Are the records produced by this investment appropriately scheduled with the National Archives and Records Administration's approval?

No

### I.B. Summary of Funding

Provide the total estimated life-cycle cost for this investment by completing the following table. All amounts represent budget authority in millions, and are rounded to three decimal places. Federal personnel costs should be included only in the row designated "Government FTE Cost," and should be excluded from the amounts shown for "Planning," "Full Acquisition," and "Operation/Maintenance." The total estimated annual cost of the investment is the sum of costs for "Planning," "Full Acquisition," and "Operation/Maintenance." For Federal buildings and facilities, life-cycle costs should include long term energy, environmental, decommissioning, and/or restoration costs. The costs associated with the entire life-cycle of the investment should be included in this report.

Table 1: SUMMARY OF SPENDING FOR PROJECT PHASES (REPORTED IN MILLIONS) (Estimates for BY+1 and beyond are for planning purposes only and do not represent budget decisions)									
	PY - 1 and Earlier	PY 2006	CY 2007	BY 2008	BY + 1 2009	BY + 2 2010	BY + 3 2011	BY + 4 and Beyond	Total
Planning									
Budgetary Resources	0.1	0	0	0					
Acquisition									
Budgetary Resources	1.61	0	0	0					
Subtotal Planning & Acquisition									
Budgetary Resources	1.71	0	0	0					
Operations & Maintenance									
Budgetary Resources	4.096	2.289	2.479	2.61					
TOTAL									
Budgetary Resources	5.806	2.289	2.479	2.61					
Government FTE Costs									
Budgetary Resources	0.512	0.085	0.0875	0.0901					
Number of FTE represented by Costs:	4.00	0.50	0.50	0.50					

**Note:** For the cross-agency investments, this table should include all funding (both managing partner and partner agencies).

Government FTE Costs should not be included as part of the TOTAL represented.

2. Will this project require the agency to hire additional FTE's? No

a. If "yes," How many and in what year?

3. If the summary of spending has changed from the FY2007 President's budget request, briefly explain those changes:

Increase FTE cost per year by 3%.

#### I.C. Acquisition/Contract Strategy

1. Complete the table for all (including all non-Federal) contracts and/or task orders currently in place or planned for this investment. Total Value should include all option years for each contract. Contracts and/or task orders completed do not need to be included.

##### Contracts/Task Orders Table:

2. If earned value is not required or will not be a contract requirement for any of the contracts or task orders above, explain why:

It is not a physical or intellectual asset. It is a contract for consulting services that includes well documented requirements. Services are delivered for a fixed price during the five year contract period. The system was delivered in FY 2003. SBA exercised the third of four option years for 12 months beginning on April 1, 2006. Contract deliverables are required as scheduled. Schedules, included in this paragraph as examples, vary depending on the nature of the deliverable. Continuous Internet access to the Risk Management Database is provided daily. SBA Loan Accounting System is uploaded monthly. Loans are scored and the resultant risk analytics are uploaded and reported quarterly. Portfolio demographics and the attendant risk profiles are analyzed and presented in an annual analytics report. Housekeeping deliverables, such as the monthly report supporting the Computer Incident Response Capability, are scheduled to meet compliance deadlines. SBA and the contractor meet on a regular, scheduled weekly basis to maintain operational functionality. Operational status reports are provided monthly. There are frequent, ongoing meetings, on an ad hoc basis, as necessary to support problem resolution, assess training needs, and implement system security and functionality enhancements. The contractor provides industry standard "state of the art" risk analysis for the financial services industry. The analytics used in preparing risk assessment data for the SBA are proprietary to the vendor. The investment does not create or transfer ownership of analytic methodology to the SBA. L/LMS is not a system of record (SOR). It is hosted on the vendor's computer. It receives data from SBA's SORs, but does not export any data back. Interaction is one sided. Existing systems are the sources of information uploaded to the vendor's lender oversight and risk management database of SBA data. No vendor data is uploaded into the Agency's accounting systems.

3. Do the contracts ensure Section 508 compliance? Yes

a. Explain why:

4. Is there an acquisition plan which has been approved in accordance with agency requirements? Yes

a. If "yes," what is the date?

4/26/2002

b. If "no," will an acquisition plan be developed?

1. If "no," briefly explain why:

#### I.D. Performance Information

In order to successfully address this area of the exhibit 300, performance goals must be provided for the agency and be linked to the annual performance plan. The investment must discuss the agency's mission and strategic goals, and performance measures must be provided. These goals need to map to the gap in the agency's strategic goals and objectives this investment is designed to fill. They are the internal and external performance benefits this investment is expected to deliver to the agency (e.g., improve efficiency by 60 percent, increase citizen participation by 300 percent a year to achieve an overall citizen participation rate of 75 percent by FY 2xxx, etc.). The goals must be clearly measurable investment outcomes, and if applicable, investment outputs. They do not include the completion date of the module, milestones, or investment, or general goals, such as, significant, better, improved that do not have a quantitative or qualitative measure.

Agencies must use Table 1 below for reporting performance goals and measures for all non-IT investments and for existing IT investments that were initiated prior to FY 2005. The table can be extended to include measures for years beyond FY 2006.

Performance Information Table 1:

Fiscal Year	Strategic Goal(s) Supported	Performance Measure	Actual/baseline (from Previous Year)	Planned Performance Metric (Target)	Performance Metric Results (Actual)
2003	Improve Financial Performance.	Automate manual process. Apply automated quarterly off-site review process with much more detail (every loan assessed) than the manual review process. This is applied to all 7(a) & 504 lenders (and all loans).	Less than 400 lenders reviewed and analyzed per year by Kansas City Review Branch, and less than 700 lenders per year reviewed and analyzed by the SBA district offices.	Analyze over 5,500 lenders per Quarter -- providing off-site reviews and monitoring. Produce 'Flags' for lender results.	This has greatly reduced the burden on our private lending partners. We can now direct limited human capital on a risk basis. Over 5,500 lenders monitored on a continuous basis.
2004	Improve Financial Performance.	Expand to 6 databases and multiple records for each lender for efficiency and to maintain historical performance measures.	L/LMS consists of 3 databases that are becoming crowded as data needs increase. It uses 1 record for each lenders. There are one database each for 7(a) and 504 loans, and one for lenders.	Expand lender databases to 24 records per lender to track two years history.	Enhanced six database version of RAM upgrade completed. Lender risk rating and trends are calculated quarterly for all 3,000 lenders. The new fields provide performance metrics using over 100,000 calculated ratios per year.
2005	Improve Financial Performance.	Implement: 4 quarters of lenders risk rating	Quarterly scoring on over 250,000 loans, 'rolled-up' to	Implement exception, portfolio, lender reports.	Detailed analytical reports prepared monthly, provided

		assessments; and implement quarterly Risk SBA Rating of Lenders using a custom developed linear regression model based on credit risk and performance data. Accumulate 12 months of historical data for 3,000 lenders.	over 3,000 7(a) & 504 lenders, for quarterly off-site reviews and reporting.	Monthly portfolio analysis reports similar in nature to private sector lender reporting, and consistent with industry best practices. Provide 12 monthly and one annual analytic r	to Portfolio Analysis Committee. Annual portfolio performance and trends are presented in a highly detailed report that includes analysis by segment such as delivery method, industry,
2006	Improve Financial Performance. Provide an E-Gov solution for a process currently performed manually.	An automated on-line report will be generated for each individual lender. An electronic, Internet accessible "Lender Portal" will be established so that lenders can view, print, and download the analytical information for only their own institution. 3,000 lenders will have electronic access to their own information. This is the same risk rating information SBA uses.	Zero lenders currently have electronic access to the performance characteristics of their individual institutions.	Automated reports will be available to the 3,000 lenders with outstanding SBA loan balances. Lender Portal providing electronic access to reports. Lender Portal electronic mailbox will provide e-mail capability for len	The Lender Portal was activated and announced via Federal Register on May 1, 2006. Automated reports are available for all 5,200 7(a) and 504 lenders. Access IDs and passwords are provided in a timely manner when requested.
2007	Improve Financial Performance.	Continue to operate and fine tune the L/LMS. Consistently benefit from human capital savings and directing limited resources using a risk based approach. Maintain a high level of financial performance and reporting for 3,000 lenders.	All components of L/LMS will be in Operating and Maintenance (steady state) Mode	Maintain automated quarterly reviews of the 3,000 lenders that have outstanding SBA guarantees. Maintain electronic access for lenders to view, print, and download the report of their individual institution.	TDB
2008	Improve Financial Performance.	Continue to operate and fine tune the L/LMS. Consistently benefit from human capital savings and directing limited resources using a risk based approach. Maintain a high level of financial performance and reporting for 5,000 lenders.	All components of L/LMS will be in Operating and Maintenance (steady state) Mode	Maintain automated quarterly reviews of the 5,000 lenders that have outstanding SBA guarantees. Maintain electronic access for lenders to view, print, and download the report of their individual institution.	TBD
2009	Improve Financial Performance.	Continue to operate and fine tune the L/LMS. Consistently benefit from human capital savings and directing limited	All components of L/LMS will be in Operating and Maintenance (steady state) Mode	Maintain automated quarterly reviews of the 5,000 lenders that have outstanding SBA guarantees.	TBD

		resources using a risk based approach. Maintain a high level of financial performance and reporting for 5,000 lenders.		Maintain electronic access for lenders to view, print, and download the report of their individual institution.	
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All new IT investments initiated for FY 2005 and beyond must use Table 2 and are required to use the Federal Enterprise Architecture (FEA) Performance Reference Model (PRM). Please use Table 2 and the PRM to identify the performance information pertaining to this major IT investment. Map all Measurement Indicators to the corresponding "Measurement Area" and "Measurement Grouping" identified in the PRM. There should be at least one Measurement Indicator for at least four different Measurement Areas (for each fiscal year). The PRM is available at [www.egov.gov](http://www.egov.gov).

Performance Information Table 2:							
Fiscal Year	Measurement Area	Measurement Category	Measurement Grouping	Measurement Indicator	Baseline	Planned Improvement to the Baseline	Actual Results

#### I.E. Security and Privacy

In order to successfully address this area of the business case, each question below must be answered at the system/application level, not at a program or agency level. Systems supporting this investment on the planning and operational systems security tables should match the systems on the privacy table below. Systems on the Operational Security Table must be included on your agency FISMA system inventory and should be easily referenced in the inventory (i.e., should use the same name or identifier).

All systems supporting and/or part of this investment should be included in the tables below, inclusive of both agency owned systems and contractor systems. For IT investments under development, security and privacy planning must proceed in parallel with the development of the system/s to ensure IT security and privacy requirements and costs are identified and incorporated into the overall lifecycle of the system/s.

Please respond to the questions below and verify the system owner took the following actions:

1. Have the IT security costs for the system(s) been identified and integrated into the overall costs of the investment:	Yes
a. If "yes," provide the "Percentage IT Security" for the budget year:	0
2. Is identifying and assessing security and privacy risks a part of the overall risk management effort for each system supporting or part of this investment.	Yes

3. Systems in Planning - Security Table:	
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Name of System	Agency/ or Contractor Operated System?	Planned Operational Date	Planned or Actual C&A Completion Date
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#### 4. Operational Systems - Security Table:

Name of System	Agency/ or Contractor Operated System?	NIST FIPS 199 Risk Impact level	Has C&A been Completed, using NIST 800-37?	Date C&A Complete	What standards were used for the Security Controls tests?	Date Complete(d): Security Control Testing	Date the contingency plan tested
L/LMS	Contractor Only	Low	Yes	6/14/2004	FIPS 200 / NIST 800-53	8/16/2006	2/28/2006

5. Have any weaknesses related to any of the systems part of or supporting this investment been identified by the agency or IG? No

a. If "yes," have those weaknesses been incorporated agency's plan of action and milestone process? Yes

6. Indicate whether an increase in IT security funding is requested to remediate IT security weaknesses? No

a. If "yes," specify the amount, provide a general description of the weakness, and explain how the funding request will remediate the weakness.

#### 7. How are contractor security procedures monitored, verified, validated by the agency for the contractor systems above?

Monitoring, verifying, and validating contractor security procedures are incorporated into SBA's overall Continuous Monitoring Process. The Office of Lender Oversight Development and the OCIO IT Security are primarily responsible for security and continuous monitoring for the LLMS investment. The following SBA's Continuous Monitoring Process schedule of activities describes how the program offices provide relevant continuous monitoring: Annually SBA: conducts self assessments of security controls including, but not limited to, verifying accounts, file permissions for sensitive files, disabling of unnecessary services, configuration of access control filters; completes FISMA Self Assessment; conducts training and document/report security training; and Incident Response Training Status for individuals with access to the system. Quarterly SBA: scans for vulnerabilities in the system and report results quarterly and additionally as required due to system changes and identification of new potential vulnerabilities. Monthly SBA: audits accounts against termination personnel records, and reviews user and administrator accounts for continued need for access and for appropriateness of privileges. Daily SBA: reviews server audit logs and report suspicious activity. Continuously SBA: monitors firewall audit logs for suspicious activity and unauthorized changes to the firewall rule base, monitors and responds to real-time intrusion alarms and video surveillance displays; and monitors and reports alerts from the host intrusion detection sensors on the SBA LLMS System.

#### 8. Planning & Operational Systems - Privacy Table:

Name of System	Is this a new system?	Is there a Privacy Impact Assessment (PIA) that covers this system?	Is the PIA available to the public?	Is a System of Records Notice (SORN) required for this system?	Was a new or amended SORN published in FY 06?
L/LMS	No	Yes.	Yes.	No	No, because the system is not a Privacy Act system of records.

#### I.F. Enterprise Architecture (EA)

In order to successfully address this area of the business case and capital asset plan you must ensure the investment is included in the agency's EA and Capital Planning and Investment Control (CPIC) process, and is mapped to and supports the FEA. You must also ensure the business case demonstrates the relationship between the investment and the business, performance, data, services, application, and technology layers of the agency's EA.

**1. Is this investment included in your agency's target enterprise architecture?** Yes

**a. If "no," please explain why?**

It is not a physical or intellectual asset. This is a contract for consulting services. The contractor provides industry standard "state of the art" risk analysis for the financial services industry. The analytics used in preparing risk assessment data for the SBA are proprietary to the vendor. The investment does not create or transfer ownership of analytic methodology to the SBA. L/LMS is not a system of record (SOR). It is hosted on the vendor's computer. It receives data from SBA's SORs, but does not export any data back. Interaction is one sided. Existing systems are the sources of information uploaded to the vendor's lender oversight and risk management database of SBA data. No vendor data is uploaded into the Agency's accounting systems.

**2. Is this investment included in the agency's EA Transition Strategy?** Yes

**a. If "yes," provide the investment name as identified in the Transition Strategy provided in the agency's most recent annual EA Assessment.** L/LMS "Loan Management and Accounting System - Exhibit 2-3 Exhibit 4-9"

**b. If "no," please explain why?**

CHET??

### 3. Service Reference Model (SRM) Table:

Identify the service components funded by this major IT investment (e.g., knowledge management, content management, customer relationship management, etc.). Provide this information in the format of the following table. For detailed guidance regarding components, please refer to <http://www.whitehouse.gov/omb/egov/>.

Agency Component Name	Agency Component Description	Service Domain	FEA SRM Service Type	FEA SRM Component	FEA Service Component Reused Name	FEA Service Component Reused UPI	Internal or External Reuse?	BY Funding Percentage
Mathematical	Support the formulation and mathematical analysis of probabilistic models for random phenomena and the development and investigation of methods and principles for statistical inference	Business Analytical Services	Analysis and Statistics	Mathematical			No Reuse	100

Use existing SRM Components or identify as "NEW". A "NEW" component is one not already identified as a service component

in the FEA SRM.

A reused component is one being funded by another investment, but being used by this investment. Rather than answer yes or no, identify the reused service component funded by the other investment and identify the other investment using the Unique Project Identifier (UPI) code from the OMB Ex 300 or Ex 53 submission.

'Internal' reuse is within an agency. For example, one agency within a department is reusing a service component provided by another agency within the same department. 'External' reuse is one agency within a department reusing a service component provided by another agency in another department. A good example of this is an E-Gov initiative service being reused by multiple organizations across the federal government.

Please provide the percentage of the BY requested funding amount used for each service component listed in the table. If external, provide the funding level transferred to another agency to pay for the service.

#### 4. Technical Reference Model (TRM) Table:

To demonstrate how this major IT investment aligns with the FEA Technical Reference Model (TRM), please list the Service Areas, Categories, Standards, and Service Specifications supporting this IT investment.

FEA SRM Component	FEA TRM Service Area	FEA TRM Service Category	FEA TRM Service Standard	Service Specification (i.e. vendor or product name)
Mathematical	Service Access and Delivery	Access Channels	Web Browser	Netscape Communicator
Mathematical	Service Access and Delivery	Delivery Channels	Virtual Private Network (VPN)	Sprint
Mathematical	Service Access and Delivery	Service Requirements	Legislative / Compliance	Privacy: Platform for Privacy Preferences (P3P)
Mathematical	Service Access and Delivery	Service Requirements	Legislative / Compliance	Section 508

Service Components identified in the previous question should be entered in this column. Please enter multiple rows for FEA SRM Components supported by multiple TRM Service Specifications

In the Service Specification field, Agencies should provide information on the specified technical standard or vendor product mapped to the FEA TRM Service Standard, including model or version numbers, as appropriate.

5. Will the application leverage existing components and/or applications across the Government (i.e., FirstGov, Pay.Gov, etc)?

No

a. If "yes," please describe.

6. Does this investment provide the public with access to a government automated information system?

No

a. If "yes," does customer access require specific software (e.g., a specific web browser version)?

1. If "yes," provide the specific product name(s) and version number(s) of the required software and the date when the public will be able to access this investment by any software (i.e. to ensure equitable and timely access of government information and services).

### Exhibit 300: Part III: For "Operation and Maintenance" investments ONLY (Steady State)

#### III.A. Risk Management

Part III should be completed only for investments which will be in "Operation and Maintenance" (Steady State) in FY 2008, i.e., selected the "Operation and Maintenance" choice in response to Question 6 in Part I, Section A above.

You should have performed a risk assessment during the early planning and initial concept phase of this investment's life-cycle, developed a risk-adjusted life-cycle cost estimate and a plan to eliminate, mitigate or manage risk, and be actively managing risk throughout the investment's life-cycle.

Answer the following questions to describe how you are managing investment risks.

1. Does the investment have a Risk Management Plan? Yes

a. If "yes," what is the date of the plan? 7/28/2006

b. Has the Risk Management Plan been significantly changed since last year's submission to OMB? Yes

c. If "yes," describe any significant changes:

No significant changes. Most recent update is July 28, 2006.

2. If there currently is no plan, will a plan be developed?

a. If "yes," what is the planned completion date?

b. If "no," what is the strategy for managing the risks?

#### III.B. Cost and Schedule Performance

1. Was operational analysis conducted? No

a. If "yes," provide the date the analysis was completed.

b. If "yes," what were the results?

c. If "no," please explain why it was not conducted and if there are any plans to conduct operational analysis in the future:

SBA was using EVMS to manage this service. We are in the process of developing an operational analysis template with a target implementation date of the second quarter of FY 2007.

Complete the following table to compare actual cost performance against the planned cost performance baseline. Milestones reported may include specific individual scheduled preventative and predictable corrective maintenance activities, or may be the total of planned annual operation and maintenance efforts:

a. What costs are included in the reported Cost/Schedule Performance information  
(Government Only/Contractor Only/Both)?

Contractor Only

2. Comparison of Plan vs. Actual Performance Table

Comparison of Plan vs. Actual Performance Table

Milestone Number	Description of Milestone	Planned		Actual		Variance	
		Completion Date	Total Cost	Completion Date	Total Cost	Schedule (# days)	Cost
1	Annual Contract Deliverables	07/31/2006	\$1.627	07/31/2006	\$1.627	0	\$0.000